

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

**This Document Relates to the TPP Trial
Subclasses**

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

TPP TRIAL DEFENDANTS' NOTICE OF MOTIONS IN LIMINE¹

¹ These Motions in Limine concern the claims designated in the Court's Case Management Order No. 32 (the "TPP Trial Claims"), specifically, the claims of Plaintiff MSP Recovery Claims, Series LLC, as class representative of TPP Breach of Express Warranty subclass b, TPP Fraud subclass c, and TPP State Consumer Protection Laws subclass a, against the TPP Trial Defendants. (ECF 2343 at 1-2.) Accordingly, this motion is limited to the TPP Trial Claims, and is presented without waiver of any arguments for exclusion of any evidence from trial with respect to any other claims asserted by any plaintiff as to any defendants in this multidistrict litigation.

PLEASE TAKE NOTICE that on March 18, 2024, Defendants Zhejiang Huahai Pharmaceutical Co., Ltd.; Huahai U.S., Inc.; Princeton Pharmaceutical Inc.; Solco Healthcare U.S., LLC; Teva Pharmaceuticals USA, Inc.; Teva Pharmaceutical Industries Ltd.; Actavis LLC; Actavis Pharma, Inc.; Torrent Pharmaceuticals Ltd.; and Torrent Pharma, Inc. (collectively, the “TPP Trial Defendants”), by and through their undersigned counsel, shall move for the entry of an Order excluding certain evidence from trial of this matter. This motion is made to the Hon. Robert B. Kugler, United States District Judge, pursuant to the Federal Rules of Evidence and the applicable local rules of this Court.

PLEASE TAKE FURTHER NOTICE that in support of this motion, the TPP Trial Defendants shall rely on the accompanying Memorandum of Law in Support of TPP Trial Defendants’ Motions in Limine and the exhibits thereto.

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith;

PLEASE TAKE FURTHER NOTICE that oral argument is requested, if this motion is opposed; and

PLEASE TAKE FURTHER NOTICE that a Certificate of Service attesting to the date and manner of service is submitted herewith.

Dated: February 16, 2024

Respectfully submitted,

By: /s/ Jessica Davidson
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 16, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Jessica Davidson
Jessica Davidson